

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Teddy Gadsden
[Enter the full name of the plaintiff in this action]

RECEIVED, CLERKS OFFICE
Civil Action No. 2:11-CV-2169-DCN-BM

(to be assigned by Clerk)
2011 AUG 16 P 1:53

COMPLAINT

State Prisoner DISTRICT CT COLA, SC

v.

AL CANNON

AL Cannon Detention Center

Marybeth Mullaney

Detective Holmes

Scarlett A. Wilson

[Enter above the full name of defendant(s) in this action]

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes _____ No ✓

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: N/A

Defendant(s): _____

2. Court: N/A

(If federal court, name the district; if state court, name the county)

3. Docket Number: N/A

4. Name(s) of Judge(s) to whom case was assigned: N/A

5. Disposition: N/A

(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: AL CANNON Detention Center
- B. What are the issues that you are attempting to litigate in the above-captioned case? false imprisonment,
Violation of Constitutional rights
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☐ No ☒
- When _____ Grievance Number (if available) _____
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☐ No ☐ N/A
- E. When was the final agency/departmental/institutional answer or determination received by you? _____
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☐ No ☐ N/A
- G. If your answer is YES:
1. What steps did you take? N/A
2. What was the result? _____

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

- A. Name of Plaintiff: Teddy Gadsden Inmate No.: 1310286
Address: A.C.D.C. 3841 Leeds Ave. N. Charleston, S.C. 29405

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: AL CANNON Position: Sheriff
Place of Employment: Sheriff Department

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Marybeth Mullaney - Public Defender
Detective Holmes -
Scarlett A. Wilson - Solicitor Ninth Judicial Circuit

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

ON May 3rd 2009 I was arrested for several alleged armed robberies / Poss. of deadly weapon during commission of a violent crime.. I was charged with four counts of each charge. Prior to my arrest on May 3rd 2009, I was employed at Fire House Subs located in N. Charleston. I was being paid \$8.25 a hour. Also I was employed at Hardey's in West Ashley earning \$7.25 a hour. I worked both jobs to support my 2 yr old daughter and to pay monthly bills. Rent, electricity, food. Once I was falsely arrested on May 3rd 2009 I lost both jobs, because the bond I received for all 8 charges were beyond my family income to bond me out. I remained in A.C.D.C. for over a year. May 3rd 2009 thru May 27, 2010. During this time I was appointed a Public Defender by the name of Marybeth Mullaney. I advised Ms. Mullaney I was not guilty of the charges I was accused of committing. The Solicitor over the Ninth Judicial Circuit is Scarlett A. Wilson. Ms. Wilson allowed me to sit in the A.C.D.C. for over a year on charges her office dropped on May 27, 2010. Mr. Al Cannon is the Sheriff, also where I was housed is Mr. Cannon's Detention Center. Now it shows Mr. AL Cannon allows detectives like Detective Holmes to bring (me) Teddy Gadsden to his Detention

IV. STATEMENT OF CLAIM - continued.

Center on 8 alleged charges without any evidence or proof I committed the alleged crimes. Furthermore Detective Holmes should of thoroughly investigated before locking me up. As a result of all above parties mistakes I lost over a year of my life being incarcerated, both jobs I struggled so hard to get, time with my 2 yr old daughter, and family. During the year I was incarcerated I continued to tell my Public Defender Ms. Mullaney to bring it to Ms. Wilson I was not guilty but to no avail.

V. RELIEF

State briefly and exactly what you want the court to do for you.

I would like to be acommmendated firstly for earnings I would recieved annually for both jobs I lost as a result of me being incarcerated. Also the federal tax return I would've recieved claiming 2 dependents. For the phycologrcial and mental tourment, false arrest, false imprisonment, Violation of my Constitutional rights I ask to be acommmendated. I am asking this court to award me in actual damages in the Amount of \$150,000. Also I would like to be awarded in punitive damages in the amount of 5 million dollars.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this _____ day of August 13, 20 11.

Jeddy Madison

Signature of Plaintiff